

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TREY GREENE, individually and on behalf
of all others similarly situated,

Plaintiff

v.

ZAC PRINCE, FLORI MARQUEZ, TONY
LAURA, JENNIFER HILL, and GEMINI
TRADING, LLC,

Defendants.

Case No. 2:23-cv-01165

**[PROPOSED] ORDER GRANTING THE MOTION OF ANTONIE ELAS FOR
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD
COUNSEL**

On the motion of Antonie Elas, and the Court having read all parties' papers, and considered all arguments of counsel, and good cause appearing,

IT IS THIS _____ day of _____, 2023, ORDERED AS FOLLOWS:

1. Antonie Elas is hereby appointed as Lead Plaintiff. Antonie Elas satisfies the requirements for lead plaintiff pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(iii) and 15 U.S.C. § 77z-1(a)(3)(B)(iii) of the Private Securities Litigation Reform Act of 1995 (the "PSLRA").

2. Pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v) and 15 U.S.C. § 77z-1(a)(3)(B)(v), the Court approves of Antonie Elas' selection of Lockridge Grindal Nauen P.L.L.P. and Gustafson Gluek PLLC as lead counsel ("Lead Counsel").

3. Lead Counsel shall have the following responsibilities and duties, to be carried out personally or through counsel whom Lead Counsel shall designate:

- a. to coordinate the briefing and argument of motions;
- b. to coordinate the conduct of discovery proceedings;

- c. to coordinate the examination of witnesses in depositions;
 - d. to coordinate the selection of counsel to act as a spokesperson at pretrial conferences;
 - e. to call meetings of plaintiff's counsel as they deem necessary and appropriate from time to time;
 - f. to coordinate all settlement negotiations with counsel for defendants;
 - g. to coordinate and direct the pretrial discovery proceedings and the preparation for trial and the trial of this matter and to delegate work responsibilities to selected counsel as may be required; and
 - h. to supervise any other matters concerning the prosecution, resolution, or settlement of this action.
4. No motion, request for discovery, or other pretrial proceedings shall be initiated or filed by any plaintiff without the approval of Lead Counsel, so as to prevent duplicative pleadings or discovery by plaintiffs. No settlement negotiations shall be conducted without the approval of Lead Counsel.
5. Counsel in any related action that is consolidated with this Action shall be bound by this organization of plaintiff's counsel.
6. Lead Counsel shall have the responsibility of receiving and disseminating Court orders and notices.
7. Lead Counsel shall be the contact between plaintiff's counsel and defendants' counsel, shall serve as the spokesperson for plaintiff's counsel, and shall direct and coordinate the activities of plaintiff's counsel.

8. During the pendency of this litigation, or until further order of this Court, the parties shall take reasonable steps to preserve all documents within their possession, custody, or control, including computer-generated and stored information, and materials such as data and electronic mail, containing information which is relevant or which may lead to the discovery of information relevant to the subject matter of the pending litigation.

IT IS SO ORDERED:

HON. KEVIN MCNULTY, U.S.D.J.